UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 2 3 2015

Mr. Lawrence Smith, PP, AICP
Senior Planner
Dewberry
600 Parsippany Road, Suite 301
Parsippany, NJ 07054

Dear Mr. Smith:

This is in response to your November 19, 2014 e-mail requesting a Sole Source Aquifer review of the proposed demolition and reconstruction project ("Fisherman's Landing – NCR39812") in the Borough of Point Pleasant Beach, Ocean County, New Jersey. The aforementioned project is being reviewed for environmental compliance for inclusion in the U.S. Department of Housing and Urban Development's Community Development Block Grant-Disaster Recovery funded "Neighborhood and Community Revitalization Program" The proposed project is located in the New Jersey Coastal Plain Aquifer System, designated by the Environmental Protection Agency (EPA) as a Sole Source Aquifer on June 24, 1988 (citation 53 F.R. 23791). Therefore, our review has been conducted in accordance with Section 1424(e) of the Safe Drinking Water Act (SDWA).

The property in question was previously a commercial fishing operation. The 7-acre waterfront site, known as "Fishermen's Landing", lies along the outlet of the Manasquan River and is located at 117-301 Channel Drive. We observe, based on aerial views, that the project site is largely vacant land, with a large building at the western end of the site (301 Channel Drive) and another in the middle of the site (205-209 Channel Drive). The proposed project includes demolition of the latter building, modernization of the building at 301 Channel Drive, and the reconstruction of the damaged bulkhead, about half of which is made of steel and the other half, of wood. The property will receive public water from the Borough of Point Pleasant Beach Water Department and will be served by public sewer. Stormwater drainage is accommodated by the sanitary sewer system.

Our main Sole Source Aquifer concerns with this project pertain to the aboveground storage tanks (ASTs) on the project site:

(1) We note that there exists on the project site an 18,000-gallon, double-walled tank containing diesel fuel, with the space between the walls sufficient to contain the volume of liquid in the inner tank. We request that a professional engineer demonstrate, by calculation, that the space between the walls of the tanks can in fact accommodate the entire contents of the primary tank if that tank leaks. There should also be a means of monitoring the contents of the inner tank, to detect leakage.

(2) We note that there exist three 300-gallon aboveground storage tanks (ASTs) containing lubricating oil used for fishing boat engines. We further note that these tanks are located within a 20-foot long secondary containment made of steel. We request that the volume of that containment be able to accommodate the volume of these tanks plus any rainwater that might accumulate (unless rainwater will not get into the containment).

(3) We note that the applicant plans to move the tanks to the western end of the property to be closer to where boats will load and unload. We expect that special care will be taken in moving the tanks, which presumably will be empty at the time of the move. We also ask you to consider installing *elevated* tanks, to harden them against future flooding. It would also make sense to have an impermeable concrete pad beneath the fuel tank to catch any spills during its refilling.

(4) We expect that a Spill Prevention Control and Countermeasure (SPCC) plan will be in place, prepared and certified by a professional engineer. The engineer should also develop and certify a Storm Plan that will provide the tanks with sufficient protection in the event of a major storm and accompanying flood conditions. Please see the enclosed information.

(5) Our research indicates that tanks generally survive flood conditions when they are protected against becoming buoyant. Thus, we recommend that either the tanks have sufficient contents and that the contents are preferably 3 to 6 feet above flood level, or that the tanks are securely anchored. Connecting piping and valves should be taken into account in avoiding buoyancy.

Based on the information provided and with the indicated provisos, this project satisfies the requirements of Section 1424(e) of the SDWA. Please be advised that meeting the requirements of 1424(e) does not preclude the need to meet National Environmental Policy Act (NEPA) requirements to address direct, indirect, and cumulative impacts. This review does not constitute a review under Section 309 of the Clean Air Act; EPA therefore reserves the right to review additional environmental documents on this project.

At this time, EPA offers the following additional comments to minimize environmental impacts from this project and to create a more sustainable project.

Construction and Demolition:
To the maximum extent possible, project managers are encouraged to utilize local and recycled materials in the construction process and to recycle materials generated onsite (i.e., demolition debris/materials). Millions of tons of *usable* material are needlessly buried each year in landfills. Energy and natural resources can be saved and/or usage reduced and the initial projected budget for a project may be decreased in the end. For more information, please see the following websites:
http://www.epa.gov/wastes/nonhaz/industrial/cd/index.htm
http://www.epa.gov/osw/conserve/imr/index.htm

Typical bid specifications do not address opportunities for recycling, salvage, and building disassembly and materials reuse. Working with recycling facilities and deconstruction operations can lead to improved environmental outcomes and material sales may offset some project costs. Although this is not a residential demolition project, you may still find useful EPA's report and tool, "On the Road to Reuse: Residential Demolition Bid Specification Development Tool" (EPA Report 560K13002). The tool allows the user to anticipate the environmental issues and concerns such that they can be factored into the planning and procurement process. The user is aided in developing contract language for a bid package that instructs contractors on specific technical requirements to achieve improved environmental results in a demolition project. Please refer to: http://www2.epa.gov/large-scale-residential-demolition/road-reuse-residential-demolition-bid-specification-development

Clean Diesel:
Implement diesel controls, cleaner fuel, and cleaner construction practices for on-road and off-road equipment used for transportation, soil movement, or other construction activities, including:

- Strategies and technologies that reduce unnecessary idling, including auxiliary power units, the use of electric equipment, and strict enforcement of idling limits; and
- Use of clean diesel through add-on control technologies like diesel particulate filters and diesel oxidation catalysts, repowers, or newer, cleaner equipment.

For more information on diesel emission controls in construction projects, please see: http://www.northeastdiesel.org/pdf/NEDC-Construction-Contract-Spec.pdf

Stormwater:
We emphasize the importance of Low Impact Development (LID) principles such as minimizing effective imperviousness to create site drainage, and the planting of native and non-invasive vegetation on the project site for stormwater management purposes. Other LID practices can include bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. For further information, please see the following website: http://water.epa.gov/polwaste/green/

Encourage cost-efficient, environmentally friendly landscaping:
EPA's GreenScapes program provides cost-efficient and environmentally friendly solutions for landscaping. For additional information, please see: http://www.epa.gov/wastes/conserve/tools/greenscapes/index.htm

Energy-Efficiency:
Energy-efficient technologies should be incorporated into the buildings. Please see the following website: http://www.energystar.gov

Water conservation and efficiency in building construction:
Promote water conservation and efficiency through the use of water efficient products (e.g., toilets, faucets, showerheads) and practices. For new building construction projects, we recommend considering the use of products with the WaterSense label where appropriate. Please refer to the WaterSense website for tips on water efficiency, a WaterSense labeled product

search tool, a list of WaterSense Partners, and access to the Water Budget Tool at:
http://www.epa.gov/watersense/

In addition to using WaterSense labeled products and certified professionals, there are many water conservation strategies and best management practices that can be used in new construction. Here are some useful links to water conservation information:
http://www.wbdg.org/resources/water_conservation.php
http://www.allianceforwaterefficiency.org/
http://www.wateruseitwisely.com/100-ways-to-conserve/index.php

If you have any questions concerning this matter or would like additional information, please feel free to contact Rajini Ramakrishnan of my staff at (212) 637-3731.

Sincerely yours,

Grace Musumeci, Chief
Environmental Review Section